



NISAR LAW GROUP, P.C.

One Grand Central Place
60 East 42nd Street, Suite 4600
New York, NY 10165

Casey J. Wolnowski, *Senior Managing Counsel*

Email: cwolnowski@nisarlaw.com

Phone: (646) 889-1007

Fax: (516) 604-0157

May 3, 2023

Via ECF

Hon. Paul A. Crotty, U.S.D.J.
U.S. District Court (S.D.N.Y.)
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: Letter Seeking Rescheduling of Scheduled Pre-Motion Conference
Doe v. Gooding, Jr. (Case No.: 1:20-cv-06569 (PAC))**

Your Honor,

This letter is submitted on behalf of Plaintiff with respect to the above-captioned matter and in light of so much of the Court's order entered May 2, 2023 which scheduled a pre-motion conference for Wednesday, May 10, 2023 at 12:30 PM. For the reason discussed below, Plaintiff respectfully requests the Court to reschedule the conference.

Significantly, Plaintiff's counsel—the undersigned—has to attend a court-ordered deposition on Wednesday, May 10, 2023, in the matter of *Latoya C. Robinson v. Catnip & Carrots Veterinary Hospital, P.C., et al.*, Index No. 602370/ 2022 (NYS Sup. Ct., Nassau Cnty.). On March 27, 2023, the court ordered this deposition to be conducted on May 10, 2023.

Plaintiff's counsel has conferred with Defendant's counsel and Plaintiff's counsel is not available to reschedule for either Monday or Tuesday of next week and it appears Defendant's counsel of record—Ed Sapone—is not available to reschedule for either Thursday or Friday of next week.

That said, Plaintiff respectfully requests the Court reschedule the pre-motion conference for a day and time early in the week during the week of May 15, 2023.

Plaintiff and counsel thank the Court for its attention to this matter.

Respectfully submitted,

Casey J. Wolnowski, Esq.
Attorney for Plaintiff

cc: Defendant's counsel (*via ECF*)